



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105**

January 5, 2018

Derek J. Robinson, BRAC Environmental Coordinator  
Department of the Navy  
Base Realignment and Closure Program Management Office West  
33000 Nixie Way, Building 50  
San Diego, CA 92147

Re: EPA Comments on the Draft Remedial Action Completion Report for the Durable Covers  
Remedy in Parcel B-2, Hunters Point Naval Shipyard, San Francisco, California,  
November 2017

Dear Mr. Robinson:

Attached are EPA's comments on the Draft Remedial Action Completion Report for the Durable  
Covers Remedy in Parcel B-2, Hunters Point Naval Shipyard, San Francisco, California, dated  
November 2017.

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at  
huang.judy@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Judy C. Huang". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Judy C. Huang, P.E.  
Remedial Project Manager

cc:

Nina Bacey, DTSC (via email)  
Tina Ures, RWQCB (via email)  
Amy Brownell, SFDPH (via email)  
Sharon Ohannessian, US Navy (via email)  
Danielle Janda, US Navy (via email)

**Review of the Draft Remedial Action Completion Report for the  
Durable Covers Remedy in Parcel B-2, Hunters Point Naval Shipyard,  
San Francisco, California, November 2017**

**GENERAL COMMENT**

1. A tabular summary that lists all major events associated with the Remedial Action (RA) and the dates of those events, starting with the Record of Decision (ROD) signature, should be provided as indicated by Exhibit 2-5 Recommended Remedial Action Report Contents from the EPA's Close Out Procedures for National Priorities List Sites dated May 2011. While a construction schedule table (Table 1, Construction Schedule for Durable Covers Remedial Action) has been provided, some significant milestones and dates are missing. Example milestones include the ROD signature, remedial design submittal/approval, decision document modifications, etc. Please revise the Draft Remedial Action Completion Report for the Durable Covers Remedy in Parcel B-2, Hunters Point Naval Shipyard, San Francisco, California, dated November 2017 (the Draft RACR) to include these missing events in Table 1 or to provide a separate table with this information.

**SPECIFIC COMMENTS**

1. **Section 3.2.5, Bay Water Quality Monitoring, Page 3-5 and Appendix C, Bay Water Quality Summary Report:** Section 3.2.5 should also mention that additional background monitoring occurred from February 4 to February 13, 2015 prior to the second phase of revetment construction as indicated in Appendix C (Section 2.1.1, Background Turbidity, Page 2-1 and Section 3.1, Sample Collection and Analysis, Page 3-1). Please revise the main text to include the additional background monitoring that was conducted prior to the second phase of revetment construction.
2. **Section 3.2.5, Bay Water Quality Monitoring and Appendix C, Bay Water Quality Summary Report, Section 3.3.2, Bay Water Quality Monitoring Data During Construction:** The text should discuss whether any measures were taken to minimize the impact of construction on water quality due to exceedences of the criteria for polychlorinated biphenyls (PCBs), metals, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPH). Please revise the text to discuss whether measures were taken to minimize the impact of construction on water quality.
3. **Section 3.4.1, Importation of Shoreline Revetment Materials, Page 3-10 and Appendix H1, Contractor Quality Control Documentation:** The first paragraph in Section 3.4.1 indicates that materials testing was performed and that results are in Appendix H1, but the results of the material testing cannot be found in Appendix H1. Appendix H1 includes Shoreline Excavation and Revetment checklists but under the "Receivables" heading, but Quality Control (QC) Certification and other materials testing related documents are marked as "N/A." Please revise the text to clarify the type of materials testing that was performed to verify costal armoring materials met project specifications and include testing results in the Draft RACR.

4. **Section 3.6.6, Extension of Monitoring wells, Page 3-15:** The text should clarify whether the materials used for the solvent welded coupling was free of volatile organic carbons (VOCs) or specify the VOCs that were present in the weld materials. Solvent welded couplings typically require use of a two part solvent cement, both of which may contain VOCs and contaminate groundwater samples. Please revise the text to clarify whether materials used for the solvent welded coupling had VOCs.
5. **Section 3.8.2, Overburden Removal, Page 3-18:** Section 3.8.2 states that the top 8 feet of clean overburden material was removed for reuse as backfill, but it is unclear whether the material (i.e., soil) was tested to ensure it was clean and appropriate for reuse as backfill. Please revise the text to discuss how the overburden material was determined to be clean.
6. **Section 3.9, Characterization, Management, and Disposal of Waste Stockpiles, Page 3-21:** The number of stockpiles and a summary of stockpile results should be included in the Draft RACR. The second paragraph indicates that characterization samples were collected from each stockpile of waste material, but it is unclear how many stockpiles were sampled. Additionally, this section should summarize the overall analytical results from the stockpiles in a table or provide example sample identification labels so that stockpile samples can be identified in Appendix H2, Analytical Laboratory Results. Please revise the Draft RACR to include this information.
7. **Figure 4, Remedial Action Overview for Parcel B-2, Figure 8, Restrictions for Parcel B-2, Figure C-2, Bay Water Quality Sampling Locations in Parcel B-1, and Figure C-3, Bay Water Quality Sampling Locations in Parcel B-2:** Most of contour lines are missing elevation labels except in specific parts of the figures (e.g., southern part in Parcel B-1). Please revise the Draft RACR to include elevation labels on contour lines on all relevant figures.

#### **MINOR COMMENTS**

1. **Appendix B, CERCLA Stormwater Plan Documentation:** Several scanned document headings and descriptions are difficult to read (e.g., BMP Inspection Report, PDF Page 142). Please ensure that all scans and copies are legible.
2. **Appendix C, Tables:** Several tables in Appendix C have “Notes” that are incomplete because the end of the notes are missing. This includes Table C-3, Background Bay Water Results (continued) (PDF Page 457-458), Table C-4, Bay Water Analytical Results (PDF Page 460). Please revise the tables to ensure that complete “Notes” are provided.
3. **Appendix H1, Contractor Quality Control Documentation, PDF Page 11267:** The Final Inspection Checklist should be signed. Please revise Appendix H1 to include a signed Final Inspection Checklist.